

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case No. 4:13-CR-147
)	
v.)	
)	MOTION FOR LEAVE TO FILE
LI SHAOMING, MO HAILONG, also)	UNDER SEAL
known as Robert Mo, WANG LEI,)	
WANG HONGWEI, YE JIAN, and LIN)	
YONG,)	
)	
Defendants.)	

The Defendant, Mo Hailong requests this Court leave to file his reply brief in support of his motion to amend conditions of pretrial release under seal. In support of his motion, Mr. Hailong states as follows:

1. The undersigned counsel has filed a motion to amend Mr. Hailong's conditions of pretrial release. Dkt. No. 173. The government has resisted. Dkt. No. 185. Mr. Mo intends early on February 2, 2015 to file a short reply brief in support of the motion.

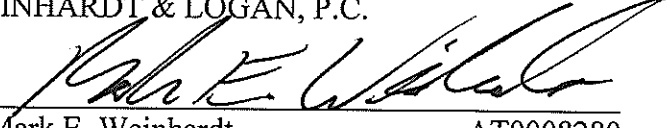
2. Due to extensive media interest in this case, including attempts to film the Defendant, the parties wish to keep the details of his conditions of his release confidential.

3. The government is in agreement with briefing regarding this motion being filed under seal.

WHEREFORE, the Defendant, Mo Hailong, prays this Court for an order granting his motion for leave to file the reply brief in support of his pending motion under seal.

WEINHARDT & LOGAN, P.C.

By


Mark E. Weinhardt

AT0008280

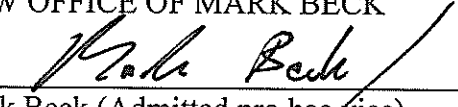
Holly M. Logan

AT0004710

2600 Grand Avenue, Suite 450
Des Moines, IA 50312
Telephone: (515) 244-3100
E-mail: mweinhardt@weinhardtlogan.com
hlogan@weinhardtlogan.com

LAW OFFICE OF MARK BECK

By


Mark Beck (Admitted pro hac vice)

350 West Colorado Blvd, Suite 200
Pasadena, CA 91105
Telephone: (626) 234-5334
Email: mbeck@markbecklaw.com
ATTORNEYS FOR MO HAILONG, ALSO
KNOWN AS ROBERT MO

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon the parties to this action by serving a copy upon each of the attorneys listed below on Jan 30, 2015, by

- | | |
|---|--|
| <input type="checkbox"/> U.S. Mail | <input type="checkbox"/> FAX |
| <input type="checkbox"/> Hand Delivered | <input type="checkbox"/> Electronic Mail |
| <input type="checkbox"/> FedEx/ Overnight Carrier | <input checked="" type="checkbox"/> CM / ECF |

Jason T. Griess
U.S. Attorney's Office
jason.griess2@usdoj.gov

Marc Krickbaum
marc.krickbaum@usdoj.gov

Leon F. Spies
Mellon & Spies
Spieslegal@aol.com

Terry W. Bird
Bird Marella
TWB@birdmarella.com

ATTORNEYS FOR Mo Yun

Signature:

